

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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THE BASU GROUP INC.,	:	
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	:	
Plaintiff,	:	Civil Action No. 16-cv-00461-PGG
	:	ECF CASE
v.	:	
	:	
SEVENTH AVENUE, INC.,	:	
	:	
Defendant.	:	
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STIPULATION FOR EXTENSION OF DEADLINES

The parties in the above subject litigation herein respectfully request the Court enter this Stipulation seeking a three (3) month extension of the deadline to complete fact discovery of paragraph 6 of the Civil Case Management Plan and Scheduling Order (“Scheduling Order”), entered onto the docket of this case as Document 26, on July 26, 2016 (a copy of which is attached hereto as Exhibit A), as well as all subsequent dates of the Scheduling Order, as follows:

6. The parties must complete fact discovery no later than **January 31, 2017**.
- 7.c. Complete depositions of fact witnesses by **January 31, 2017**.
8. The parties must complete expert discovery no later than **March 31, 2017**.

- a. Every party-proponent that intends to offer expert testimony in respect of a claim – including any counterclaim, cross-claim or third-party claim – must make the disclosures required by Federal Rule of Civil Procedure 26(a)(2) by **February 7, 2017**. Every party-opponent of such claim that intends to offer expert testimony in respect of such claim must make the disclosures required by Federal Rule of Civil Procedure 26(a)(2) by **February 21,**

2017.

10. Parties seeking to make post-discovery dispositive motions should submit a letter to the Court in accordance with Rule 4(A) of the Court's Individual Practices by **February 7, 2017**. Opposition letters are due **February 14, 2017**.

Pursuant to Rule 1(D) of the Court's Individual Practices, the parties state:

- (1) The deadlines sought to be extended are those starting from the current fact discovery closing date of October 31, 2016, and that all of these dates be moved forward by three (3) months, respectively. Such three month movement of such dates are shown above.
- (2) The requested extension of the parties is three (3) months.
- (3) This is the parties' first request for extension of these dates.
- (4) The parties have been unable to complete document production, and as such, no depositions have yet taken place and the parties do not anticipate being able to do so by the upcoming October 31, 2016 deadlines. The parties have also been negotiating various discovery disputes, and such are not yet resolved.
- (5) Both parties consent to the above extensions.

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CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the document entitled “**STIPULATION FOR EXTENSION OF DEADLINES**,” was served on the below identified counsel for Defendant, on this 24th day of October, 2016, via Email, with consent:

Ralph H. Cathcart, Esq.
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and

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Dated: October 24, 2016

By: /Michael R. Gilman/
Michael R. Gilman (MG 7608)